

Message

From: Deborah Hawthorne [DHawthorne@ntglobal.com]
Sent: 7/29/2018 8:13:56 PM
To: Lundelius, Diana [Lundelius.Diana@epa.gov]
Subject: NSPS 40 CFR 60 Subparts OOOO and OOOOa - Annual Reporting

Ms. Lundelius,

Several of our clients have OOOO applicable compressors that still require annual reporting to update rod packing replacement information. These reports are due by January 13th of each year.

NSPS OOOO 60.5420 (b) states *"You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period."*

While this paragraph was discussing Title V reporting is it possible to include the OOOO applicable affected facilities with a company's OOOOa annual report? This would not extend the reporting period for the OOOO facilities but it would allow a company to have one compliance period and submit a single report. Please let me know what is the proper method for requesting authorization. The only company that I am aware of submitting a joint report just stated the that was what they were doing when they submitted the first annual OOOOa report.

I am also checking on the status of reporting through the CEDRI system. My understanding is the online form has not yet been finalized and therefore in Texas we are to continue sending reports to the TCEQ with an emailed copy to EPA Region 6. Please let me know if there are any changes.

Thank you

Deborah Hawthorne

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